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Attorneys For Defendants  
JHS-1451

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

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JOHN HORTON

Plaintiff,

-vs-

ROSS UNIVERSITY SCHOOL OF MEDICINE,  
et al

Defendants

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:  
: CIVIL ACTION NO.:04-5658 (JAG)  
:

:  
: **CERTIFICATION OF**  
: **KATHLEEN M. CONNELLY, ESQ. IN**  
: **SUPPORT OF MOTION FOR**  
: **SUMMARY JUDGMENT**  
:

Kathleen M. Connelly, of full age, does hereby certify that:

1. I am an attorney at law in the State of New Jersey and am a member of the law firm of Lindabury, McCormick & Estabrook. As such, I have personal knowledge of the facts and circumstances set forth herein.

2. Annexed as Exhibit 1 is a true copy of the Complaint filed by the plaintiff, John Horton, in this matter.

Annexed as Exhibit 2 is a true copy of the transcript of the deposition of John

Horton on May 13, 2005.

3. Annexed hereto as Exhibit 3 is a true copy of a Westlaw search of cases wherein plaintiff, John Horton, was a plaintiff or defendant in litigation in the Federal Courts.

4. Annexed hereto as Exhibit 4 is a true copy of the reported opinions wherein the plaintiff, John Horton, was a plaintiff or defendant.

5. Annexed hereto as Exhibit 5 is a true copy of the results of a Westlaw search reflecting the docket in a Federal criminal proceeding initiated against plaintiff entitled *USA v. Horton*, docket # 5:01-M-00617, pending before the Eastern District of North Carolina.

6. Annexed hereto as Exhibit 6 is a true copy of Ross University School of Medicine's posting for the position of Medical Library Director dated April 7, 2003. This document was marked as Exhibit 2 at plaintiff's deposition.

7. Annexed hereto as Exhibit 7 is a true copy of an e-mail resume from John Horton dated January 13, 2003. This document was identified by plaintiff at his deposition and marked as Exhibit 1.

8. Annexed hereto as Exhibit 8 is a true copy of various e-mails exchanged between John Horton and Dr. Jorge Rios between January 15 and January 21, 2003. This document was identified by plaintiff at his deposition and marked as Exhibit 3.

9. Annexed hereto as Exhibit 9 is a true copy of various e-mails exchanged between John Horton, Dr. Jorge Rios and Michelle Fried between January 15 and January 22, 2003. This document was identified by plaintiff at his deposition and marked as Exhibit 4.

10. Annexed hereto as Exhibit 10 is a true copy of e-mails exchanged between John Horton and Michelle Fried between January 23 and February 1, 2004. This document was identified by plaintiff at his deposition and marked as Exhibit 5.

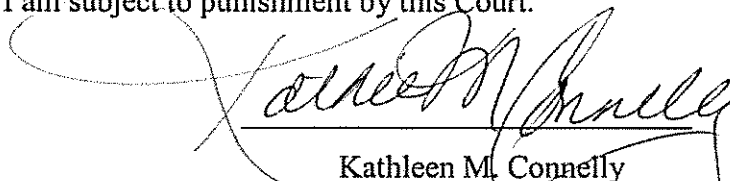
11. Annexed hereto as Exhibit 11 is a true copy of Plaintiff's Responses to Defendant's Initial Interrogatories in this litigation.

12. Annexed hereto as Exhibit 12 is a true copy of various e-mails exchanged between John Horton and Glenda Mallowney between January 24 and January 25, 2005. This document was produced as Exhibit A-1 by plaintiff in response to defendant's initial interrogatories.

13. Annexed hereto as Exhibit 13 is a true copy of an e-mail resume received by Ross University from John Horton on February 18, 2003. This document was identified by plaintiff at his deposition and marked as Exhibit 7.

14. Annexed hereto as Exhibit 14 is a true copy of a cover letter and resume posted on the Webhire Recruiter website. This document was identified by plaintiff at his deposition and marked as Exhibit 8.

I certify that the foregoing statements made by me are true. I am aware that if any of my statements are willfully false that I am subject to punishment by this Court.



Kathleen M. Connelly

Dated: August 15, 2005